

EXHIBIT 13

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ETIOPIA EVANS, et al.,
Plaintiffs,

CIVIL ACTION FILE

vs.

NO. 3:16-CV-01039-WHA

ARIZONA CARDINALS FOOTBALL
CLUB, LLC, et al.,

Defendants.

~~~~~

VIDEO DEPOSITION OF  
ALPHONSO CARREKER

December 9, 2016

9:17 a.m.

38th Floor Conference Room  
1180 Peachtree Street, NE  
Atlanta, Georgia

S. Julie Friedman, CCR-B-1476

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APPEARANCES OF COUNSEL

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also Present:

Terry Wetz, Videographer

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3 Alphonso Carreker

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| 12 | Exhibit 10                                                                                  | 7-19-90 Acknowledgement, CONFIDENTIAL, CARREKER 0000176; 4-1-90 List of Injuries at Physical Exam, CONFIDENTIAL, 179; 2-23-89 Release, CONFIDENTIAL, 227; 1991 List of Injuries at Physical Exam, CONFIDENTIAL, 516 | 332  |
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| 21 |                                                                                             |                                                                                                                                                                                                                     |      |
| 22 |                                                                                             |                                                                                                                                                                                                                     |      |
| 23 | (Original Defendant's Exhibits 1 through 10 have been attached to the original transcript.) |                                                                                                                                                                                                                     |      |
| 24 |                                                                                             |                                                                                                                                                                                                                     |      |
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1 THE VIDEOGRAPHER: And we are on the  
2 record. The time is approximately 9:17 a.m.  
3 Today's date is December 9th, 2016.

4 This is the beginning of videotape  
5 deposition of Mr. Alphonso Carreker.

6 Would counsel present please identify  
7 themselves and who they represent for the  
8 record.

9 MR. GRYGIEL: Steve Grygiel for the  
10 plaintiffs and for the witness.

11 MR. OLESON: Nathan Oleson for the  
12 defendants. Also with me is Dan Nash also for  
13 defendants.

14 THE VIDEOGRAPHER: Thank you, Counsel.

15 Would the court reporter please swear the  
16 witness.

17 ALPHONSO CARREKER, having been first duly  
18 sworn, was examined and testified as follows:

19 CROSS-EXAMINATION

20 BY MR. OLESON:

21 Q. Good morning, Mr. Carreker.

22 A. Good morning.

23 Q. Can I ask you to state your full name for  
24 the record.

25 A. Alphonso Carreker.

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1 sleep on a pillow to this day. I mean, it hurts that  
2 bad, so it never goes away.

3 Q. Right. I -- I understand that. I'm just  
4 trying to get a sense for when you first had the  
5 burner, how long did they give you medications for  
6 that?

7 A. Probably the whole season, and that and  
8 for other things.

9 Q. Okay. And you say the whole season. Did  
10 you -- Is it your testimony that you received  
11 medications every single day while you were with the  
12 Packers?

13 A. You wouldn't receive it every day. They  
14 will give you enough to last to the end of the week.

15 Q. Okay. And what medications were you given  
16 when you were with the Packers?

17 A. All --

18 MR. GRYGIEL: Objection. Objection.  
19 Foundation. Form.

20 THE WITNESS: I'm going to say  
21 painkillers. That could be Vicodin, Tylenol 3.  
22 I don't if it was Percocet.

23 I mean, everybody -- The NFL was stuck on  
24 hydrocodrones. You got that when you got on a  
25 plane, if you needed them.

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1 Muscle relaxers.

2 And those big orange Motrin 800s, you got  
3 those as much as you want, because you need to  
4 go through practice. Those -- Those are the  
5 things that would take the swellingness out or  
6 your knees or your joints, anything that you  
7 hurt that will get you able to get back on the  
8 practice field, so you can at least run, try to  
9 stay in shape.

10 So at some point in the NFL, you're taking  
11 stuff every day. You're -- you're -- You're  
12 constantly putting problem on top of problem on  
13 top of problem, so at some point, you are taking  
14 something every day.

15 Q. (By Mr. Oleson) So do you  
16 specifically require -- remember taking Tylenol 3  
17 with the Packers?

18 A. Yeah. T-3s are what they call them.  
19 Yeah.

20 Q. Okay.

21 A. Yeah.

22 Q. Do you know how much you took?

23 A. I don't know, man. On a game, you -- you  
24 come in after a game, especially after away game, I  
25 had to have that just to get off the plane. Some --



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1 I -- I remember taking three or four of those things  
2 sometimes. They -- they just --

3 As you get on the plane, they give you a  
4 bag of -- with two or three beers in them on ice; and  
5 the next guy giving you is some pain pills, and  
6 you -- whatever, either pain pills or muscle  
7 relaxers; and you chugging those things down with a  
8 beer and -- and sitting down and eating the sandwich  
9 they gave you.

10 Q. What do -- Do you remember what the T-3  
11 pills look like?

12 A. No, sir. I just know they were big.  
13 That's what they called them, the T-3s, Tylenol with  
14 codeine.

15 Q. Okay. And you said you were --  
16 specifically remember taking them when you came back  
17 from away games; is that correct?

18 A. I was just -- I'm just trying to  
19 recollect to -- to give you an answer, an example.

20 I always took them when I got on the  
21 plane, or you take them after a game. And the colder  
22 it get, the more stiffer you got.

23 Q. How about Motrin 800s? Do you  
24 specifically remember taking those while you were  
25 with the Packers?

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1 Foundation.

2 THE WITNESS: In my life --

3 Q. (By Mr. Oleson) Sure.

4 A. -- that they -- that they told me that was  
5 untrue?

6 Q. Correct.

7 A. No. I can't really say that, because if I  
8 needed something for a headache, back spasm, or my  
9 neck pain or back pain, they gave me something that  
10 it always pretty much worked. It always worked.

11 So like I said, I trusted those guys.  
12 Those were my friends. I believed in them.

13 If I still saw some of the ones that's not  
14 dead, I would still talk with them; but I can't say  
15 what was true and what was not true. They never  
16 explained anything to me but other than the fact that  
17 they were going to help me with my pain, manage my  
18 pain.

19 Q. Okay. So there's never a time where they  
20 said anything about a medication that you learned  
21 later that was not a true statement?

22 MR. GRYGIEL: Objection. Form.  
23 Foundation.

24 THE WITNESS: I'm still not getting where  
25 you're coming from.

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1 MR. GRYGIEL: Objection.

2 Q. (By Mr. Oleson) -- the Green Bay Packers  
3 doctors?

4 MR. GRYGIEL: Objection. Form.  
5 Foundation.

6 THE WITNESS: I don't know if they ever  
7 lied to me about anything. Because like I said,  
8 I believed everything they told me. I had no  
9 reason to disbelieve anything they told me.

10 I -- That was their job to me, and I  
11 trusted them as my friend and as a former  
12 employee that we were going to -- that they were  
13 there to help me with whatever physical problems  
14 that I had, and they helped me manage the pain  
15 that I was going through to help me play  
16 football throughout the whole year.

17 I had no other reason to think that these  
18 were dishonest people at all.

19 Q. (By Mr. Oleson) Okay. And I'm -- I just  
20 want to make it clear or make sure I understand you.

21 Sitting here today, there's no statement  
22 that you can look back on from the Green Bay Packers  
23 doctors that you now know wasn't true?

24 MR. GRYGIEL: Objection. Form.  
25 Foundation.

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1 THE WITNESS: The biggest thing that I  
2 know I can say right now is that I wish I knew  
3 by taking a lot of stuff, at one point would be  
4 damaging to a person or -- I had --

5 At that time in my life, I had no idea  
6 about side effects or what side effects did to  
7 you. I didn't think these things could come  
8 back and harm any -- anyone in no kind of manner  
9 at all; or by taking them to try to manage pain  
10 to play football, that it will increase the --  
11 the risk of me having more arthritic problems,  
12 because I'm playing under the -- under the fact  
13 that -- under hypnosis that I've got -- that I'm  
14 not hurt as bad as I am, because I -- I am  
15 taking pain medicine. So I had no idea anything  
16 about that.

17 Q. (By Mr. Oleson) So what -- what things do  
18 you wish you had been told by the Green Bay Packers  
19 doctors?

20 A. I think all doctors or all trainers in the  
21 NFL should have something on the wall or have a  
22 meeting with these guys to inform them if you are  
23 taking certain medications for -- heavily the way we  
24 take them at a certain time, that you are at risk for  
25 certain other diseases that can pop up or whatever.

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1           That's -- That's one of the things that  
2       needs to change, and I don't know if they have done  
3       that or not. I'm kind of further removed from the  
4       NFL 15, 20 years, but it needs --

5           The warning labels need to be there.  
6       That -- That's something that needs to be talked  
7       about. That's something that need to be shared with  
8       these guys, because I don't think they know.

9           Because you're taking painkillers. You're  
10      taking muscle relaxers. You're taking  
11      anti-inflammatories. A lot of guys are taking  
12      multivitamins with these things now, and they've got  
13      all kinds of stuff that these guys are taking to try  
14      to help them keep their body at -- at, you know, at  
15      optimum levels of play; and you don't know, if by  
16      taking all this stuff together, what it can do to  
17      you. You don't know the side effects, so I think all  
18      of that stuff need to be discussed.

19           So even when I took a multivitamin -- it  
20      just came to my head -- I would take it to the head  
21      trainer. Say, hey, is this okay? Is this something,  
22      especially when they started testing us for steroids.

23           Q.     That's something you did do when you were  
24      in the NFL?

25           A.     Yeah.

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1 Q. Okay. With the multivitamins you took?

2 A. Uh-huh.

3 Q. When did you take multivitamins, just with  
4 both the Packers and the Broncos?

5 A. I think I might have taken them probably  
6 about after my fourth or fifth year. I didn't know  
7 anything about them. I mean, I'm -- Like I said,  
8 I'm learning from the veterans; but I didn't want  
9 to --

10 'Cause at -- at some point, they start  
11 testing us for steroids; and any kind of different  
12 things, L-tryptophan, all that stuff like that that's  
13 in certain vitamins, you can get suspended for, so  
14 it's most the time, you see a guy get suspended on TV  
15 for a growth hormone or steroid, it's -- it's  
16 something he bought at GNC that's got one ingredient  
17 that's messing it up.

18 So it would kind of behoove you, if you  
19 didn't want to get suspended, to say, hey, look at  
20 that and tell me if there's anything in here.

21 And they'll say, hey, no. Get rid of  
22 that. You don't want that.

23 Q. And back to the things you wish you had  
24 been told. Is -- Is there anything that, had you  
25 been told about it with Green Bay, you would not have

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1 taken the medication?

2 A. Absolutely. Especially when I really had  
3 a serious injury, I would have just requested that  
4 let me heal properly, naturally; and I cannot play in  
5 pain with this injury.

6 If it takes me two weeks to -- to heal, I  
7 think I -- I need to have that, instead of having me  
8 go right back out there and play and knowing I'm out  
9 there high or taking all this stuff playing just  
10 to -- just to play.

11 I think they should just let me just --  
12 If it took me a month for stuff to heal, let it heal  
13 on its own, instead of giving me stuff to get me back  
14 on the field.

15 Q. Is there any specific side effect of a  
16 particular drug that, had you known about it, you  
17 would have refused to take the medication?

18 MR. GRYGIEL: Objection. Foundation.

19 THE WITNESS: I think that could go with  
20 all of them.

21 I mean, I really never knew anything about  
22 renal failure until I retired; and I didn't know  
23 anything about -- you know, that's the  
24 kidneys -- or people having liver disease,  
25 people having heart issues, or things of that

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1 because of excess of taking of prescription med.

2 I had no idea of that. I'm 25, 24 years  
3 old. I'm living the life. I'm having -- I've  
4 got a great wife. I'm making great money. You  
5 know, I'm -- I'm on top of the world.

6 But I didn't know any of that. No.

7 Q. (By Mr. Oleson) Recalling when you were  
8 24 or 25, if you were told back then there may be a  
9 chance of liver disease if you take this drug, would  
10 you have taken it?

11 MR. GRYGIEL: Objection. Form.  
12 Foundation.

13 THE WITNESS: I wouldn't have took as  
14 much. I would have -- I would have asked  
15 what's the regulations? I mean, if -- If I'm  
16 taking 60, 70 of these pills a week, is that too  
17 much? Well, that's excessive.

18 I don't know what was excessive. I -- I  
19 would have liked if someone would have told me  
20 what would have been excessive.

21 I mean, don't just hand me a bag of pills  
22 and say take them as needed; and you've got  
23 three different ones. I just thought that --  
24 I'm thinking it back now. That was just a  
25 little excessive.



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1 lie to you about medications?

2 MR. GRYGIEL: Objection. Form.

3 Foundation.

4 THE WITNESS: I can't say that they ever  
5 lied to me about medications. I don't think  
6 those guys were truthful with me as far as  
7 taking a certain amount of medications every day  
8 or every week in the milligrams, in the amount,  
9 and the volumes that I was taking or that we  
10 were taking could be harmful for you.

11 That would have been something that would  
12 have been -- that -- that should have been said  
13 that wasn't, so I can't say that they lied to  
14 me. They just didn't inform me.

15 Q. (By Mr. Oleson) Okay. And that was going  
16 to be my follow-up question is -- is they never told  
17 you there's no problem with this dosage. It's just  
18 that they never told you what the potential  
19 consequences would be for the dosage?

20 MR. GRYGIEL: Objection. Form.

21 Foundation.

22 Q. (By Mr. Oleson) Is that what you're  
23 saying?

24 MR. GRYGIEL: Objection to form.

25 Foundation.

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1           You knew -- You knew that these guys  
2       needed help. There's no way they can do that without  
3       it. No way. If they did, they -- they wouldn't have  
4       played as long as they did.

5           Q.     And we asked it earlier. I'll try to ask  
6       it this way and the way that -- that you understood  
7       the best, I think, which was: Did you ever see any  
8       of the team doctors lie to any other player about  
9       medications while in Green Bay?

10           MR. GRYGIEL: Objection. Form.  
11       Foundation.

12           THE WITNESS: No, sir.

13           Q.     (By Mr. Oleson) Okay. And you talked  
14       earlier about the -- the information that you wish  
15       you would have had from the team doctors.

16                   Do you know if they wanted to hide that  
17       information from you?

18           MR. GRYGIEL: Objection. Form.  
19       Foundation.

20           THE WITNESS: No. Like I said, these are  
21       my friends. I thought they were doing the right  
22       thing by us, and I really believed they felt  
23       they were. I just think that we shouldn't have  
24       had the opportunity to take as much.

25                   I think they were giving -- They were

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1           doing their job by keeping us on the field,  
2           period.

3           Q.       (By Mr. Oleson) And how about the  
4           trainers in Green Bay? Do you believe that they were  
5           trying to harm you if they weren't --

6           A.       No.

7           Q.       -- telling you --

8           A.       I don't think about it.

9                   MR. GRYGIEL: Objection. Form.  
10           Foundation.

11                   THE WITNESS: I'm sorry. I didn't let you  
12           finish the question but --

13                   MR. OLESON: Okay.

14                   MR. GRYGIEL: Objection. Form.  
15           Foundation.

16           Q.       (By Mr. Oleson) Let me -- let me --  
17           Let's do it all over again.

18           A.       Okay.

19           Q.       And I'll go. He'll go. Then you go.

20           A.       Okay.

21           Q.       The trainers in Green Bay, do you believe  
22           that they intended to harm you in any way if -- when  
23           they didn't give you the information that you wish  
24           you would have had about medications?

25                   MR. GRYGIEL: Objection. Form.

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1 Warmath or something like that.

2 And I went to see him after I busted up my  
3 back lifting weights. He says, "Fonzo, you have a  
4 herniated disc. The only way we can fix this thing  
5 where you can come back to play next year, we got to  
6 cut you." And that's what he did.

7 And if I didn't trust his opinion, I'd  
8 have went and got another opinion somewhere else, so,  
9 of course, I trusted him.

10 MR. OLESON: Okay. Why don't we go ahead  
11 and take a break. It's, I mean --

12 MR. GRYGIEL: I was just going to ask  
13 that. Thank you.

14 THE VIDEOGRAPHER: And we are off the  
15 record. The time is 12:02.

16 (Recess from 12:02 p.m. to 12:56 p.m.)

17 THE VIDEOGRAPHER: And we are back on the  
18 record. The time is 12:56.

19 You may continue.

20 Q. (By Mr. Oleson) Mr. Carreker, we're back  
21 on the record. You understand that you're under oath  
22 as you were before?

23 A. Yes, sir.

24 Q. Okay. Did you take any medications or  
25 anything else during the break that would make you

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1 taking them. You know, you have a good day. You  
2 have a bad day. You have a great week. You have a,  
3 well, kind of almost decent week.

4 Q. But when you said you didn't think you  
5 needed to take as much as you were taking, were they  
6 telling you to take more than you wanted to take or  
7 were you just taking more?

8 MR. GRYGIEL: Objection to form.  
9 Foundation.

10 THE WITNESS: They never told me to  
11 tell -- as much as they wanted to tell you.  
12 They just give them to you and tell them, you  
13 can take them as needed. Nobody monitored me.

14 So when they told me to take them as  
15 needed, if I needed -- If I was feeling some  
16 uncomfortness for by sitting, riding in the car  
17 going home and by the time I get home my -- my  
18 knee is killing me from being bent, I would take  
19 a pain medicine.

20 So as needed mean something was bothering  
21 me or was sore, then I would take it, especially  
22 when it got unbearable.

23 So if they gave me 30; and when those 30  
24 were gone -- I'm just hypothetically saying --  
25 they gave me another 30. There was never any

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1 questions about you're taking too many. These  
2 are too strong. You need to be careful. No.

3 It was just okay. Okay. You need some  
4 more? Wait right here. That's how it was.

5 Q. (By Mr. Oleson) So when you ran out of,  
6 let's say, your 30 that you -- you may have, you  
7 would go back to them and say I'm out of painkillers?

8 A. Right.

9 Q. And would you ask for more than?

10 A. Yes. Well, they just give them to me.

11 Q. But did they tell you, you had to take  
12 them?

13 MR. GRYGIEL: Objection. Foundation.

14 THE WITNESS: Did they tell me I had to  
15 take them. No. They take as needed. Take  
16 these as you need them. Whenever you feel any  
17 discomfort, here you go. I mean, it -- it's  
18 kind of --

19 At that point, it's kind of absurd to  
20 have -- keep giving me ten at a time. You know  
21 what I'm saying. Here, take these as you need  
22 it. Nobody never questioned me.

23 But when I asked for some more and told  
24 them I was out of them, they just gave them to  
25 me.

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1           A.       No. Because I trusted the people I was  
2       with. I saw them every day. They were my friends.

3           Q.       Okay. And I know we talked about this a  
4       little bit before. I think we talked about Green Bay  
5       and maybe a little bit about the Broncos.

6                    Were you friendly with the team doctors  
7       for the Broncos as well?

8           A.       Oh, yes. Now I -- I'm sorry. I can't  
9       remember their names, but yes. I -- Usually I saw  
10      these guys on a weekly basis for three years, and  
11      they were on the plane with us. They drank beer with  
12      us. We ate dinner together at the team meal. We ate  
13      breakfast at the breakfast meal before a game.

14                   I got a chance to meet their wives. They  
15      got a chance to meet my wife. We were friends.

16           Q.       Do you believe that any of the doctors at  
17      the Broncos had any intention of harming you when  
18      they gave you medications?

19                   MR. GRYGIEL: Objection. Form.  
20      Foundation.

21                   THE WITNESS: No. I -- I totally trust  
22      those guys, because they were my friends.

23           Q.       (By Mr. Oleson) How about the trainers at  
24      the Broncos? Do you believe they had any intention  
25      of harming you when they gave you medications?

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1 MR. GRYGIEL: Objection. Form.

2 Foundation.

3 THE WITNESS: No. I had total confidence  
4 in those guys. They were my friends.

5 Q. (By Mr. Oleson) And I think we talked  
6 about this before. I just want to make sure.

7 Do you believe that the Broncos doctors  
8 ever lied to you while you were at the Broncos?

9 MR. GRYGIEL: Objection. That was asked  
10 and answered.

11 Q. (By Mr. Oleson) Go ahead.

12 THE WITNESS: So I should answer it?

13 MR. GRYGIEL: Yeah. You can answer it.

14 THE WITNESS: Okay. Ask me that question  
15 again.

16 Q. (By Mr. Oleson) Sure. Do you believe  
17 that the Broncos doctors ever lied to you?

18 A. No. I don't think they lied to me, but I  
19 think they should have -- I think -- I wish they'd  
20 been a little bit more informative to me about the  
21 amount of -- of -- concern about the amount of  
22 medication that they knew I was taking and any other  
23 guy on the team. I wish that would have been  
24 discussed.

25 Q. Do you remember having any conversation



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1 with any of the doctors or trainers at the Broncos  
2 about any of the side effects of the medications you  
3 were train -- taking?

4 MR. GRYGIEL: Objection. Form.  
5 Foundation.

6 THE WITNESS: No, sir. We never even  
7 talked about any of that.

8 Q. (By Mr. Oleson) Do you remember that you  
9 never talked about it, or you just don't remember if  
10 you did talk about it?

11 A. No. I remember that we never talked about  
12 that before. I never talked about it with any of the  
13 team members.

14 I -- I would have -- I thought that if  
15 someone was giving me something and they -- And I'm  
16 totally trusting in them, they're doing their job to  
17 take care of me. You get what I'm saying?

18 I'm not saying the thing I'm just going to  
19 go behind Fonzo's back and not tell him.

20 No. I never thought any of that. Like I  
21 said, we were friends.

22 Q. Did any of the Broncos trainers lie to  
23 you?

24 I have -- I think I may have asked it  
25 already.

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1 and the doctors at the Packers?

2 A. No.

3 Q. Okay. Do you know if anybody from the  
4 Broncos discussed medications with anybody else at  
5 another club?

6 MR. GRYGIEL: Objection. Foundation.

7 THE WITNESS: I have no idea.

8 Q. (By Mr. Oleson) Okay. How about at the  
9 Packers? Do you know if anybody in the Packers  
10 discussed medications with anybody else at another  
11 club?

12 MR. GRYGIEL: Same objection.

13 THE WITNESS: I have no idea.

14 Q. (By Mr. Oleson) Okay. You talked about  
15 beer on the plane with the Packers. Did you also  
16 have beer on the plane with the Broncos?

17 A. I believe we did. Yes.

18 Q. Do you recall that specifically or --

19 A. I'm just going off of the norm. The  
20 planes have beer on them, anyway, so --

21 Q. Well, what I'm trying to do is: Do you  
22 specifically remember with the Broncos you had beer  
23 on the plane?

24 A. There was beer on the plane.

25 Q. Okay. Do you recall with the Broncos

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1 specifically taking any medications on the plane?

2 A. Oh, sure.

3 Q. Do you recall what you took?

4 A. From A to Z as far as pain medication. It  
5 could have been hydrocodrone, OxyContin. It could  
6 have been Tylenol. It could have been whatever. It  
7 could have been the same stuff that we've seen in  
8 these documents. I just couldn't think of the name  
9 of them as far as muscle relaxers.

10 It could have been the Motrin. I know  
11 they had the Motrin 800s. All that stuff is on the  
12 plane.

13 Like I said, when we got on the plane, the  
14 doctor and the trainer would walk down from the --  
15 They were in the front row. They -- front -- what do  
16 you call it -- the first class, and they would walk  
17 from that to the end of the plane asking players are  
18 you feeling all right? Is there anything you need?

19 Some guys, they broke out the IV on them  
20 right there. Plugged them up.

21 And they, "Fonzo, what's wrong with you?"

22 I said, "Man, my shoulder's killing me.  
23 My neck's killing me. My back's hurting me. I'm  
24 spassing (ph.) up."

25 "All right. I'll be right back for you."

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1           They'll give me the Motrin. They give me  
2     some muscle relaxers. They'll give me a Tylenol 3.  
3     They'll give me the pain pill, and I'll take all  
4     three of those and right then.

5           So that was every away game.

6           Q.     I believe you --

7           A.     We --

8           Q.     -- testified earlier, though, that you  
9     didn't take Tylenol 3 at the Broncos.

10          A.     I'm just giving you names.

11          Q.     Okay.

12          A.     I'm just giving you names. I -- I don't  
13     know which one they were. Whatever they gave me, I  
14     took it. I didn't say that they did not give it to  
15     me. I just don't remember that.

16                 I'm just telling you is that pain medicine  
17     to me was pain medicine. Whether it was a Percocet,  
18     hydrocodrone, OxyContin, whatever it was, when they  
19     gave it to me, I took it; and I think that's how it  
20     was with everyone.

21                 We didn't question whether we didn't like  
22     it or not. We just took it. You needed relief.

23          Q.     So I -- What I just want to understand,  
24     though, is: Do you recall specifically any  
25     particular medication that you took on the plane with

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1 Q. (By Mr. Oleson) Okay. How about for  
2 Broncos? Do you have any knowledge that how  
3 medications are dispensed or distributed to players  
4 on the Broncos since you've left the club?

5 MR. GRYGIEL: Objection. Form.  
6 Foundation.

7 THE WITNESS: No.

8 MR. OLESON: Okay. I don't think we have  
9 anything further at this time.

10 MR. GRYGIEL: Okay. I've got a few  
11 questions.

12 THE WITNESS: Yes.

13 REDIRECT EXAMINATION

14 BY MR. GRYGIEL:

15 Q. If you would be so kind, Mr. Carreker, as  
16 to turn to Exhibit No. 10.

17 A. Okay.

18 Q. And you see this is the checklist that  
19 says, "Check Appropriate Statements"?

20 A. Yes.

21 Q. Did you ever see such a checklist that  
22 dealt with medications as opposed to the injuries  
23 that are referred to?

24 MR. OLESON: Object to form.

25 THE WITNESS: Repeat that question.

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1 strenuous activity," closed quote.

2 Do you see that sentence?

3 A. Yes.

4 Q. What, if anything, did any team trainer  
5 tell you about the drugs that would be harmful to  
6 you, for example, in strenuous activity?

7 MR. OLESON: Object to form.

8 Go ahead.

9 THE WITNESS: None.

10 Q. (By Mr. Grygiel) Did a team doctor ever  
11 tell you what drugs specifically would be harmful to  
12 you in strenuous activity?

13 MR. OLESON: Same --

14 THE WITNESS: No --

15 MR. OLESON: -- objection.

16 THE WITNESS: -- sir.

17 Q. (By Mr. Grygiel) Do you consider  
18 participating in practice in the NFL to be a  
19 strenuous activity?

20 A. Yes, sir.

21 Q. Do you continue -- Okay. Strike that.

22 Do you consider playing in national  
23 football games to be a strenuous activity?

24 A. Yes, sir.

25 Q. Did any team member of any kind ever give

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1 you any information about drugs specifically by  
2 nature, type of drug, painkiller, muscle relaxant  
3 that would be harmful to you to in strenuous  
4 activity?

5 MR. OLESON: Object --

6 THE WITNESS: No.

7 MR. OLESON: -- to the form.

8 THE WITNESS: No, sir.

9 Q. (By Mr. Grygiel) Okay. The next sentence  
10 says, quote, "There are some drugs that cannot be  
11 taken while under the influence of another drug,"  
12 closed quote.

13 What, if anything, were you told by team  
14 trainers about those drugs?

15 A. Taken --

16 MR. OLESON: Object to form.

17 Go ahead.

18 THE WITNESS: Going to object?

19 MR. OLESON: Go ahead.

20 THE WITNESS: Drugs that's taken together?

21 Q. (By Mr. Grygiel) Yeah.

22 A. Oh, they -- they administer drugs to take  
23 together all the time.

24 Q. Did any trainer ever discuss with you what  
25 drugs couldn't be taken while you were taking some

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1 other drug?

2 A. No.

3 Q. Did any doctor ever do that?

4 A. No, sir.

5 Q. Did anybody from the Packers ever do --

6 MR. OLESON: Let me --

7 Q. (By Mr. Grygiel) -- that?

8 A. No, sir.

9 MR. OLESON: -- object to form.

10 Q. (By Mr. Grygiel) Did anyone from the  
11 Broncos ever do that?

12 A. No, sir.

13 MR. OLESON: Object to form.

14 Q. (By Mr. Grygiel) Looking at the third  
15 sentence, take a read at that for me.

16 A. Do not take any medications at training  
17 camp or during the regular season unless they are  
18 given to you by the team physician or his agents  
19 employed by the club, et cetera, trainer, nurse,  
20 referred physician.

21 Q. Did you ever take drugs from any sources  
22 other than the Packers when you played for the  
23 Packers?

24 MR. OLESON: Object to form.

25 THE WITNESS: No, sir.



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1 Q. (By Mr. Grygiel) What about with -- for  
2 the Broncos?

3 A. No --

4 MR. OLESON: Same --

5 THE WITNESS: -- sir.

6 MR. OLESON: -- objection.

7 Q. (By Mr. Grygiel) What did you understand  
8 that to mean -- Do not take any medications in the  
9 training camp or during the regular season unless  
10 they are given to you by the team physician or team  
11 physician's agents?

12 A. That meant to me that anything I needed, I  
13 come to the physician for the -- the team or the  
14 agent -- I mean, the trainer, the head trainer.

15 Q. Looking at these forms, did you ever  
16 review them with trainers, discuss their meaning?

17 MR. OLESON: Object to form.

18 THE WITNESS: No, sir.

19 Q. (By Mr. Grygiel) Did you ever discuss  
20 this particular form, Exhibit 9, with any doctor for  
21 the Broncos?

22 MR. OLESON: The same objection.

23 THE WITNESS: No, sir. I -- I don't -- I  
24 don't believe I have.

25 Q. (By Mr. Grygiel) Ever discuss Exhibit 9

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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